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12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 SAN JOSE DIVISION

15 FACEBOOK, INC. and MARK
16 ZUCKERBERG,

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Plaintiffs,

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v.

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CONNECTU, INC. (formerly known as
CONNECTU, LLC), PACIFIC
NORTHWEST SOFTWARE, INC.,
WINSTON WILLIAMS, WAYNE CHANG
AND DOES 1-25,

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Defendants.

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Case No. 5:07-CV-01389-RS

**PLAINTIFFS' MOTION TO SEAL
EXHIBITS B-D TO THE
DECLARATION OF YVONNE
GREER SUBMITTING
SUPPLEMENTAL EVIDENCE IN
SUPPORT OF PLAINTIFFS'
MOTION FOR PARTIAL SUMMARY
JUDGMENT [DOC. 251] AND
MOTION TO COMPEL
COMPLIANCE BY PACIFIC
NORTHWEST SOFTWARE AND
WINSTON WILLIAMS [DOC. 271]**

Date: February 27, 2008

Time: 9:30 A.M.

Judge: Honorable Richard Seeborg

1 Pursuant to Civil L.R. 7-11 and 79-5 (d), Plaintiffs respectfully submit this motion asking
2 the Court to file under seal Exhibits B-D to the Declaration of Yvonne Greer Submitting
3 Supplemental Evidence In Support of Plaintiffs' Motion For Partial Summary Judgment [Doc.
4 251] and Motion To Compel Compliance By Defendants Pacific Northwest Software And
5 Winston Williams [Doc. 271] ("Greer Declaration").

6 The parties entered into, and the California Superior Court issued, a Stipulated Protective
7 Order on January 23, 2006¹, which prohibits either party from filing in the public record any
8 documents that have been designated as "Confidential" or "Highly Confidential" pursuant to the
9 Protective Order.

10 **Exhibits B-D** to the Greer Declaration are true and correct copies of documents produced
11 to Plaintiffs by Pacific Northwest Software in this action in response to a Rule 34 Request for
12 Production of Documents, bearing production numbers PNS0598676-78, PNS0600661-63, and
13 PNS0602084-86. These documents were designated "Confidential" by Pacific Northwest
14 Software pursuant to the Protective Order entered in this matter, and hence are subject to Local
15 Civil Rule 79-5(d). Facebook takes no position regarding the propriety of the confidentiality
16 designation of these documents.

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19 Dated: February 22, 2008

Orrick, Herrington & Sutcliffe LLP

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/s/ Yvonne P. Greer /s/

Yvonne P. Greer
Attorneys for Plaintiffs
FACEBOOK, INC. AND MARK ZUCKERBERG

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¹ The parties are in the process of drafting a new Stipulated Protective Order pursuant to this Court's instructions at the January 16, 2008 Case Management Conference.

CERTIFICATE OF SERVICE

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on February 22, 2008.

Dated: February 22, 2008.

Respectfully submitted,

/s/ Yvonne P. Greer /s/
Yvonne P. Greer